IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

BEAUFORT DIVISION

Mitchell Goff and Brooke Goff,) Case No.: 9:22-cv-03302-DCN
	(Formerly C/A No.: 2022CP2700420)
)
Plaintiffs,)
)
v.)
) NOTICE OF REMOVAL
Michael Clay and Beeline Carriers LLC,)
)
)
Defendants.)

TO: THE UNITED STATES COURT:

Defendant, Michael Clay and Beeline Carriers LLC, would respectfully show the Court in support of its Notice of Removal that:

- 1. The Summons and Complaint in this action were filed on September 2, 2022, in the Court of Common Pleas for Jasper County, South Carolina. The Amended Summons and Complaint in this action were filed on September 21, 2022, in the Court of Common Pleas for Jasper County, South Carolina. Attached for the Court are copies of Plaintiff's Summons and Complaint and Plaintiff's Amended Summons and Complaint. The Complaint is the first pleading served upon the Defendant in this action and service was affected on September 14, 2022. Therefore, removal is timely under 28 U.S.C. §1446(b).
- The United States District Court has jurisdiction over this action pursuant to 28
 U.S.C. §1332.

The Plaintiff is a resident of the State of Florida.

Defendant Michael Clay is a resident of the State of Georgia.

Defendant Beeline Carriers, LLC is a limited liability company organized and incorporated under the laws of the State of Georgia, and has its principal place of business in the State of Georgia. Defendant Beeline Carriers, LLC has 2 member(s), who are resident(s) of the State of Georgia.

This action has been brought by the Plaintiff against the Defendants for the alleged accident which occurred in Jasper County, South Carolina.

- 3. Venue is proper in this matter in the Beaufort Division of this Court in accordance with 28 U.S.C. §1441(a).
- 4. Upon information and belief, the amount in controversy in this matter exceeds \$75,000.00 as the Plaintiffs allege that as a result of this vehicle accident, they have suffered permanent injuries, requiring medical treatment and related expenses and are asserting a loss wage claim. In addition, the Plaintiff's attorney indicated that the value of these claims exceed \$75,000 per an inquiry from Defendant's attorney.
- 5. Defendant has filed no pleadings in this action with the Court of Common Pleas for the State of South Carolina in response to this Complaint; however, Defendant's Answer to the Plaintiff's Amended Complaint is filed herewith contemporaneously.
- 6. Defendant will furnished a copy of this Notice of Removal to the Clerk of Court for Jasper County.

Signature page to follow

Respectfully submitted,

SWEENY, WINGATE & BARROW, P.A.

s/Mark S. Barrow

Mark S. Barrow Fed. I.D. No. 1220 Marshall C Crane Fed. I.D. No. 12455 Sweeny, Wingate & Barrow, P.A. Post Office Box 12129 Columbia, SC 29211 (803) 256-2233

ATTORNEYS FOR THE DEFENDANTS

Columbia, South Carolina

September 26, 2022